



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK  
BUFFALO DIVISION

**Carlanda D. Meadors** an  
individual, et al.,

Plaintiffs,

vs.

**Erie County Board of  
Elections,**

Defendant.

Case No. **21CV982** JLS

**Notice of Motion for a  
Temporary Restraining  
Order**

**Expedited Consideration  
Requested**

Moving Party:

Carlanda D. Meadors, Leonard A.  
Matarese, and Jomo D. Akono

Nature of Action:

This is a motion for a temporary  
restraining order prohibiting Erie  
County election officials from  
enforcing New York's petition  
deadline for independent  
candidates and requiring them to  
place the name of Byron W.  
Brown on the 2021 general-  
election ballot as an independent

	candidate for Mayor of the City of Buffalo.
Directed To:	Defendant Erie County Board of Elections
Date and Time:	To be set by the Court upon judicial assignment.
Place:	Western District of New York, 2 Niagara Square, Buffalo, NY 14202
Supporting Papers:	Verified Complaint and Supporting Memorandum of Law
Answering Papers:	To be set by the Court upon judicial assignment. Plaintiff intends to serve reply papers, if permitted by the Court.
Relief Requested:	An order prohibiting Erie County election officials from enforcing New York's petition deadline for independent candidates and requiring them to place the name of Byron W. Brown on the 2021 general-election ballot as an independent candidate for Mayor of the City of Buffalo, and such further relief as the Court deems just and proper.
Grounds for Relief:	Rule 65 of the Federal Rules of Civil Procedure and the First and Fourteenth Amendments to the United States Constitution as set forth in the supporting papers.

Oral Argument:

Requested.

Respectfully submitted this 30th day of August, 2021.

**/s/ Bryan L. Sells\***

Georgia Bar No. 635562

Attorney for the Plaintiffs

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*\* Application for admission pro hac vice forthcoming*

**/s/ Frank C. Callocchia**

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